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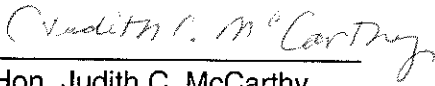
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January 22, 2024

**Via ECF**

The Honorable Judith C. McCarthy  
United States Magistrate Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

**APPLICATION GRANTED**

  
Hon. Judith C. McCarthy 1-22-2024

**Re: United States v. Justine Ying**  
**Case No.: 7:22-mj-03841-UA-4**

Dear Judge McCarthy:

The undersigned has been appointed to represent Ms. Justine Ying in the above-captioned matter. The defendant, Justine Ying, respectfully moves, pursuant to 18 U.S.C. § 3145(a)(2), to amend the conditions of her release. Ms. Ying seeks an Order of the Court to permit her to travel to Puerto Rico, with the advanced notification and approval of her United States Pretrial Services Officer, to visit the from February 15, 2024, until February 19, 2024.

In order to facilitate the defendant's request, the defendant will do the following:

1. Ms. Ying will leave on February 15, 2024, by plane and will return to the Southern District of Florida on February 19, 2024;
2. Prior to having permission to travel outside the Southern District of Florida, Ms. Ying will identify the mode of transportation to and from the destinations listed (if a motor vehicle, a picture of a license plate as well as the make, model and color of the vehicle as well as who will be driving; if a plane, a picture of the tickets to and from as well as the times and departure and arrival locations);

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3. Upon arriving back in the Southern District of Florida, Ms. Ying will telephone her probation officer and indicate that she has returned.
4. The undersigned has spoken to United States Attorney Steven Kochevar, who has indicated that the government does not object to the requested modification.
5. The undersigned has spoken to United States Pretrial Services Officers Bernisa Mejia from FLSD and Jessica Killian from NYSD, who both indicated that they have no objection to the requested modification.

WHEREFORE, the defendant moves that the Court issue an Order permitting her to travel with the advanced notification and approval of her United States Pretrial Services Officer, to visit Puerto Rico on the dates listed above, subject to the conditions imposed by her probation officer.

RESPECTFULLY SUBMITTED,

THE DEFENDANT,  
JUSTINE YING

Respectfully submitted,

*/s/ Bruce D. Koffsky*

BDK/lis